

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

Susan Webber and Jonathan St. Goddard,

Plaintiffs,

vs.

U.S. DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM in her official capacity;  
and THE UNITED STATES OF AMERICA,

Defendants.

**DECLARATION OF VERNON FINLEY**

I, Vernon Finley, under penalty of perjury declare as follows:

1. I live and work on the homelands of the Confederated Salish and the Kootenai Tribes (CSKT), also called the Flathead Nation. I have lived here all my life.
2. I am an enrolled member of the CSKT. I have friends in Canada who are also enrolled tribal members.
3. The Confederated Salish and Kootenai Tribes, is made up of three tribes, the Bitterroot Salish, Upper Pend d'Oreille, and the Kootenai. We have traditional homelands on both sides of the border with Canada. There are also other Native Americans, members of other tribes, who live on the CSKT lands.
4. My family and friends have traditionally crossed the border at the Roosville crossing. When I was growing up and through my life I would travel to Canada and cross the border with tribal identification. In fact, most border guards were well aware of our travel and often would not even ask for any documentation.

I declare under penalty of perjury, on this 7<sup>th</sup> day of April, 2025, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on April 7, 2025

  
Vernon Finley